

**UNITED STATES GOVERNMENT
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 31**

TROY SHEET METAL WORKS, INC.

Employer

and

Case 31-RC-8073
(formerly Case 21-RC-20419)

SHEET METAL WORKERS'
INTERNATIONAL ASSOCIATION,
LOCAL UNION NO. 105, AFL-CIO

Petitioner

DECISION AND DIRECTION OF ELECTION

Upon a petition duly filed under Section 9(c) of the National Labor Relations Act, as amended, herein referred to as the Act, a hearing was held before a hearing officer of the National Labor Relations Board, herein referred to as the Board.

Pursuant to the provisions of Section 3(b) of the Act, the Board has delegated its authority in this proceeding to the undersigned.

Upon the entire record in this proceeding, the undersigned finds:

1. The hearing officer's rulings made at the hearing are free from prejudicial error and are hereby affirmed.
2. The Employer is engaged in commerce within the meaning of the Act and it will effectuate the purposes of the Act to assert jurisdiction herein.^{1/}
3. The labor organization involved claims to represent certain employees of the Employer.
4. A question affecting commerce exists concerning the representation of certain employees of the Employer within the meaning of the Section 9(c)(1) and Section 2(6) and (7) of the Act.

5. The following employees of the Employer constitute a unit appropriate for the purpose of collective bargaining within the meaning of Section 9(b) of the Act:^{2/}

INCLUDED: All full-time and regular part-time employees in the production department (including mechanics, welders, assemblers, drivers, leads, CNC operators, CNC programmers, and helpers), in the warehouse department (including leads and helpers) and in the installation department (including leads and helpers) employed by the Employer at its facility located at 1024 South Vail Avenue in Montebello, California.

EXCLUDED: Estimators, office clericals, professional employees, salespersons, all other employees, guards and supervisors as defined in the Act.

DIRECTION OF ELECTION ^{3/}

An election by secret ballot shall be conducted by the undersigned among the employees in the unit found appropriate at the time and place set forth in the notice of election to issue subsequently, subject to the Board's Rules and Regulations. Eligible to vote are those in the unit who are employed during the payroll period ending immediately preceding the date of this Decision, including employees who did not work during that period because they were ill, on vacation, or temporarily laid off. Also eligible are employees engaged in an economic strike which commenced less than 12 months before the election date and who retained the status as such during the eligibility period and their replacements. Those in the military services of the United States Government may vote if they appear in person at the polls. Ineligible to vote are employees who have quit or been discharged for cause since the designated payroll period, employees engaged in a strike who have been discharged for cause since the commencement thereof and who have not been rehired or reinstated before the election date, and employees engaged in an

economic strike which commenced more than 12 months before the election date and who have been permanently replaced. Those eligible shall vote whether they desire to be represented for collective bargaining purposes by **SHEET METAL WORKERS' INTERNATIONAL ASSOCIATION, LOCAL UNION NO. 105, AFL-CIO.**

LIST OF VOTERS

In order to assure that all eligible voters may have the opportunity to be informed of the issues in the exercise of their statutory right to vote, all parties to the election should have access to a list of voters and their addresses which may be used to communicate with them. *Excelsior Underwear, Inc.*, 156 NLRB 1236 (1966); *NLRB v. Wyman-Gordon Co.*, 394 U.S. 759 (1969); *North Macon Health Care Facility*, 315 NLRB 359 (1994). Accordingly, it is hereby directed that an election eligibility list, containing the **FULL** names and addresses of all the eligible voters, must be filed by the Employer with the Regional Director for Region 21 within 7 days of the date of the Decision and Direction of Election. The list must be of sufficiently large type to be clearly legible. This list may initially be used by the Regional Director for Region 21 to assist in determining an adequate showing of interest. She shall, in turn, make the list available to all parties to the election, only after she has determined that an adequate showing of interest among the employees in the unit found appropriate has been established.

In order to be timely filed, such list must be received in the Regional Office, Region 21, 888 South Figueroa Street, 9th Floor, Los Angeles, CA 90017-5449, on or before, **February 19, 2002**. No extension of time to file this list may be granted, nor shall the filing of a request for review operate to stay the filing of such list except in extraordinary circumstances. Failure to comply with this requirement shall be grounds for setting aside the election whenever proper objections are filed. The list may be submitted by facsimile transmission. Since the list is to be made available to all parties

to the election, please furnish a total of 2 copies, unless the list is submitted by facsimile, in which case no copies need be submitted. To speed the preliminary checking and the voting process itself, the names should be alphabetized (overall or by department, etc.).

RIGHT TO REQUEST REVIEW

Under the provision of Section 102.67 of the Board's Rules and Regulations, a request for review of this Decision may be filed with the National Labor Relations Board, addressed to the Executive Secretary, 1099 14th Street, N.W., Washington, DC 20570. This request must be received by the Board in Washington by **February 26, 2002** .

DATED at Los Angeles, California this 12th day of February, 2002.

/s/ James J. McDermott
James McDermott, Regional Director
National Labor Relations Board
Region 31

FOOTNOTES

- 1/ The Employer, Troy Sheet Metal Works, Inc., a California corporation, with a facility located at 1024 South Vail Avenue, Montebello, California, is engaged in the manufacture and sales of public safety devices and the fabrication, sales and installation of environmental systems. During the past 12 months, a representative period, the Employer sold and delivered goods valued in excess of \$50,000 directly to customers located outside the State of California. Thus, the Employer satisfies the statutory jurisdictional requirement as well as the Board's discretionary standard for asserting jurisdiction herein. *Siemons Mailing Service*, 122 NLRB 81 (1958).
- 2/ The Petitioner-Union seeks to represent a unit comprised of all full-time and regular part-time and agency-supplied employees, including sheet metal installers, fabricators, manufacturers, field helpers, welders, machine operators, CNC operators, shear operators, press brake operators, roll forum operators, notchers, shop helpers, sheet metal shippers and packagers, forklift operators and drivers employed by the Employer at its facility located at 1024 South Vail Avenue, Montebello, California. The Petitioner asserts that the Unit should exclude office clerical employees, professional employees, salaried employees, guards and supervisors. The Employer asserts that it does not classify its employees by the titles used by the Petitioner-Union and that the appropriate unit should include: full-time and regular part-time production department employees (including mechanics, welders, assemblers, drivers, leads, CNC operators, CNC programmers and helpers), warehouse department employees (including leads and helpers) and installation department employees (including engineers, leads and helpers). The Employer further asserts that agency-supplied employees should be specifically excluded.

As noted above in footnote 1, the Employer manufactures and sells public safety devices, such as police car consoles for police departments. In addition, the

Employer fabricates, sells, and installs environmental systems. The Employer's employees are assigned to work in the warehouse, the production department or the installation department. The employees in the installation department are sent out to jobsites, some of which are outside the State of California, to install the Employer's product. An estimator sets up these installation projects. Mark Norkin and Don Ritter, who are vice-presidents and have an ownership interest in the Employer, are estimators. When the installation department employees are not working on a project in the field, they return to work in the production department. Some of the installation department employees receive a lower rate of pay when working in the production department than they receive while working in the field. This is due to the fact that they are not as experienced in production work. Other installation department employees, who are proficient in production work, do not receive a reduction in their hourly wage while working in the production department between installation jobs.

The parties disagree with respect to the following issues: 1) whether lead employees should be included in the unit; 2) whether agency-supplied employees should be included in the unit; 3) whether it would be appropriate to utilize a construction-industry voter eligibility formula; and 4) whether a mail ballot election would be appropriate. In addition, I will address the issue of whether employees classified as "engineer" should be included in the unit.

LEAD EMPLOYEES

The Employer classifies 6 of its employees as "lead" employees. The Petitioner-Union contends that employees designated as lead employees could be supervisors or managers. Although the Petitioner-Union asserts that it believes there actually are 6-10 employees in the lead classification, it presented no evidence to support this contention. The Petitioner-Union presented witnesses who testified that employees are not familiar with the term "lead." The Employer presented evidence that although employees may not be familiar with the "lead" designation, the

Employer does use this designation internally for accounting purposes. The Employer classifies one employee in the warehouse department, one employee in the production department, and four employees in the installation department as leads.

Section 2(11) of the Act defines the term “supervisor” as:

Any individual having the authority in the interest of the employer, to hire, transfer, suspend, layoff, recall, promote, discharge, assign, reward, or discipline other employees, or responsibly to direct them, or to adjust their grievances, or effectively to recommend such action, if in connection with the foregoing the exercise of such authority is not of a merely routine or clerical nature, but requires the use of independent judgment.

The criteria listed in Section 2(11) are to be read in the disjunctive so that the exercise of any one of the indicia listed in Section 2(11) may warrant a finding of supervisory status; however, Section 2(11) also contains the “conjunctive requirement that the power be exercised with ‘independent judgment,’ rather than in a ‘routine’ or ‘clerical’ fashion.” *Chevron U.S.A.*, 309 NLRB 59, 61 (1992).

The Board will not construe supervisory status too broadly because “[an] employee who is deemed a supervisor loses his protected right to organize, a right Congress intended to protect by the Act.” *Adco Electric*, 307 NLRB 1113, 1120 (1992). Therefore, the party attempting to exclude an individual from voting by alleging that the individual is a statutory supervisor has the burden of establishing that the individual is a supervisor within the meaning of Section 2(11) of the Act. *Ohio Masonic Home*, 295 NLRB 390, 393 (1989).

Karen Tove is the supervisor of the warehouse. Under her, there is the one employee who is classified as a lead employee and two employees classified as helpers. There is absolutely no evidence in the record that the employee in the

warehouse who is classified as a lead possesses or exercises any statutory supervisory authority. Therefore, I shall include him in the unit.

There is one employee in the production department, Richard Sojo, who is designated as a lead employee on the night shift. The production department foreman, who works on the day shift, is a supervisor within the meaning of Section 2(11) of the Act. He remains at the premises for 45-60 minutes after the night shift starts so that he can provide the night shift lead with detailed instruction concerning what work is to be done and who is to do it. On those occasions when the production department foreman does not overlap with the night shift, he leaves detailed written instructions for the night shift lead. In order to avoid problems on the night shift, the Employer selects more experienced employees to work that shift. The lead on the night shift calls the production department foreman at his home with any questions that arise during the night shift. In these circumstances, the fact that no production supervisor or manager may be present during the night shift does not render the night shift lead a supervisor within the meaning of Section 2(11) of the Act. *Summitville Tile*, 245 NLRB 863, 869 (1979).

A former employee who worked on the day shift testified that when he worked overtime he observed the night shift lead distribute work and that on occasion the night shift lead has asked him to wait to complete something so that other employees could first use certain equipment. This evidence of assignment and direction, which is routine and does not involve the use of independent judgment, is insufficient to establish that the night shift lead is a supervisor. See, *J.C. Brock Corp.*, 314 NLRB 157 (1994); *Quadrex Environmental Company*, 308 NLRB 101 (1992).

The record reveals that the production department foreman may consult with the night shift lead concerning the evaluations of employees on the night shift. The statutory definition of a supervisor does not include the action of evaluating others

as a separate indicia of supervisory authority. Therefore, when an evaluation by itself does not affect wages and/or job tenure, the individual performing the evaluation will not be found to be a supervisor. *Elmhurst Extended Care Facilities*, 329 NLRB No. 55, slip op. at 2 (September 30, 1999). There is no evidence that the Employer acts upon evaluations by the night shift lead without an independent investigation. To the contrary, the evidence reveals that the production foreman evaluates employees on the night shift based upon what he personally observes, as well as the input he receives from the night shift lead. Moreover, there is no evidence that the night shift lead performs any evaluations of employees which lead directly to personnel actions affecting those employees, such as merit pay increases. Therefore, the night shift lead's limited participation in the evaluation process does not render him a supervisor within the meaning of the Act. See, *Somerset Welding*, 291 NLRB 913, 914 (1988). Since there is no evidence that the night shift lead possesses any of the indicia of supervisory status, I shall include him in the unit.

There are 4 employees in the installation department who are classified as leads: Dante Pignotti, Fernando Benetiz, Kenneth Dixon and Jose Garcia. At the Hearing, the Hearing Officer noted that although the Employer stated that it would be willing to stipulate that Dante Pignotti, who is paid on a salary basis, should be excluded from the unit, the parties were unable to stipulate that Pignotti possessed any of the criteria that would render him a supervisor under Section 2(11) of the Act. Therefore, the parties did not enter into a stipulation concerning the exclusion of Pignotti.

There is no evidence in the record establishing that Pignotti possesses any of the indicia of supervisory status. Although a former employee testified that Pignotti provided him with an application to complete and spoke to him about his experience, there is no evidence that Pignotti can hire or effectively recommend the hiring of an employee. In fact, the production foreman testified that after this

former employee who testified at the hearing completed his application, Pignotti paged the production foreman who then independently interviewed the employee.

At the Hearing, the Petitioner-Union requested that its petition be amended to exclude salaried employees from the unit description. The fact that an employee is paid on a salaried basis, rather than an hourly basis, is not determinative of supervisory status. Therefore, I will not specifically exclude all salaried employees from the unit description. *Billows Electric Supply*, 311 NLRB 878 at fn 2 (1993).

Although Pignotti will not be excluded from the unit as a supervisory employee, or because he is paid on a salaried basis, the record reveals that he may not share a community of interest with other employees. Pignotti provides a unique function. He assists Norkin and Ritter by serving as the coordinator for installation projects. Pignotti coordinates the rental of equipment for installation projects and makes arrangements for car rentals and motel reservations for out-of-town projects. After Norkin and Ritter set up a project, if they are not available, Pignotti may go to the jobsite to provide instructions and to be sure that the job is on schedule. He ensures that equipment, such as cranes or helicopters, are available when needed and are returned to rental agencies at the appropriate time. Pignotti sometimes serves as a liaison between the Employer and the project manager at the jobsite.

In addition to being paid on a salary, rather than an hourly basis, Pignotti's hours of work are different than the hours of other employees. The Employer's President explained that Pignotti is paid on a salary basis because the Employer spreads his hours over many different projects at one time and because his hours are quite variable due to the large amount of time he spends traveling. In contrast to the other installation department employees, Pignotti does not perform any production work in the shop. Moreover, unlike the other unit employees, Pignotti shares an office at the Employer's facility, in which he has his own desk.

Notwithstanding these differences between Pignotti and other installation department employees, the record does reveal that, when necessary, Pignotti works with the other installation department employees, performing the same work that they perform. The record does not reveal how often this situation arises. Therefore, I conclude that Pignotti is a dual-function employee, who primarily performs the function of a “coordinator” and sometimes performs unit work. The Board finds that dual-function employees, who perform more than one function for an employer, “may vote even though they spend less than a majority of time on unit work, if they regularly perform duties similar to those performed by unit employees for sufficient periods of time to demonstrate that they have a substantial interest in working conditions in the unit.” *Martin Enterprises*, 325 NLRB 714, 715 (1998). Since the record herein does not reveal whether Pignotti regularly performs duties similar to those performed by unit employees for sufficient periods of time to warrant a finding that he should be eligible to vote as a dual-function employee, I will permit him to vote under challenge.

The three other employees designated as “lead” in the installation department (Fernando Benetiz, Kenneth Dixon and Jose Garcia) are more experienced than the employees in the installation department who are designated as “helpers.” Paul Alvarez is the field supervisor. He supervises the employees in the installation department who work in the field. One of the more experienced employees is assigned to work on each installation project along with one or more employees classified as “helper.” The more-experienced employee may be referred to by the Employer as “lead person,” “field mechanic,” “crew leader” or “field installer.” Alvarez testified that the term “lead” is synonymous with the term “field mechanic.” Alvarez gives his instructions to the lead employee, who is the most experienced employee working on the installation project.

It is well established that the exercise of authority by more skilled and experienced employees to assign and direct other employees in order to assure the quality of

the job does not by itself confer supervisory status. *Brown & Root*, 314 NLRB 19, 22 (1994). In *Somerset Welding & Steel*, 291 NLRB 913 (1988), the Board found that leadmen who direct employees in a routine manner and who are given the responsibility to direct work based upon their higher level of skill and greater seniority are not supervisors within the meaning of the Act. In the instant case, the employees designated as leads sign the payroll sheets for themselves and for the helpers on out-of-town jobs. However, since there is no indication that any independent judgment is exercised in connection with this routine task, this responsibility does not confer supervisory status upon the lead employees. *John N Hansen*, 293 NLRB 63, 64 (1989). Since there is no evidence that the employees designated as lead employees in the installation department possess any of the indicia of supervisory status, I conclude that they are not supervisors within the meaning of the Act.

AGENCY-SUPPLIED EMPLOYEES

When the Employer needs additional employees, the Employer first consults its current employees to see if any of them can recommend somebody for the position. The production foreman testified that the Employer usually is able to obtain employees through these means. However, if the Employer is unable to obtain additional help through referrals from its current employees, then the Employer may obtain employees through an outside employment agency. Apparently, the Employer also advertises for employees in local newspapers and/or on the Internet. Although the Employer has obtained employees in the warehouse and in the production department through a temporary employment agency, there is no evidence that the Employer has similarly obtained employees for installation work through a temporary agency. In fact none of the employees who currently work in the installation department began their employment with the Employer through a temporary employment agency. Moreover, the field supervisor testified that he is not aware of any employees being hired through a

temporary agency for installation work in the field. The Employer advertises for installation employees in local newspapers or on the Internet.

When the Employer obtains employees through a temporary employment agency, those employees remain employees of the agency for a minimum period of time, usually about three months. In some circumstances, the Employer retains the employees as regular full-time employees when the Employer is satisfied with their performance. In these circumstances, employees who obtain work with the Employer through a temporary agency would have a reasonable expectation of regular full-time employment with the Employer if they perform satisfactorily. There are two helpers in the warehouse who started to work for the Employer through a temporary employment agency and recently became regular full-time employees of the Employer. However, on other occasions, when the Employer has a large shipment to make, the Employer may hire employees through a temporary employment agency with the expectation that they will only work for the Employer for a discrete period of time. The production foreman testified that the Employer has never re-hired an employee from a temporary employment agency that they had sent back to the agency.

The Petitioner-Union asserts that agency-supplied employees should be included in the unit because they have a community of interest with other employees and they have an expectation of recall. Although the Petitioner-Union stated that it believes the Employer currently has 5-8 employees who are agency-supplied employees, it presented no evidence to substantiate this claim. The Employer asserts that agency-supplied employees should not be included in the unit because the Employer does not currently have any agency-supplied employees and has not had any for several months. The Employer also asserts that if agency-supplied employees are good employees, they may become regular full-time employees of the Employer and if they are not good employees, they will be sent back to the agency. There is no evidence that employees supplied by an agency are ever sent

back to the agency
and later recalled to work at the Employer.

The Board recently departed from precedent and determined that it will find employees who are jointly employed by a user employer and a supplier employer can be included in a unit with employees who are solely employed by the user employer, without the consent of the employers. *M.B. Sturgis*, 331 NLRB No. 173 (August 25, 2000). In these circumstances, the Board applies its traditional community of interest analysis to determine whether to include jointly employed employees in units with solely employed employees. Slip Op. at 8. In a subsequent case, *Outokumpu Copper Franklin*, 334 NLRB No. 39 (June 6, 2001), the Board found that temporary employees obtained through an agency share such a strong community of interest with the employees in the appropriate unit that their inclusion was mandated. In that case, the Board noted that the temporary employees work side-by-side with the regular employees, performing the same work functions, and are supervised by the same supervisors. Further, in that case, nearly all their terms and conditions of employment, including assignments, directions, discipline, and wages, are controlled by the user employer. The Board concluded that the fact the temporaries do not receive benefits and receive lower wages and worked under a different attendance policy was insufficient to warrant their exclusion from the unit.

At the time of the hearing in this matter, the Employer did not have any employees who were working through a temporary employment agency. Furthermore, there is no evidence that the Employer will be employing employees through a temporary employment agency in the near future. Indeed, the Employer's President testified that the Employer only "occasionally" obtains employees through temporary employment agencies. Therefore, it is not necessary for me to determine at this time whether or not agency-provided employees share a sufficient community of interest with the regular employees that they should be

included with them in the unit. I note that the evidence provided at the hearing does not provide details concerning the employment of the agency-provided employees, such as whether or not they have the same terms and conditions of employment as the Employer's regular employees. In these circumstances, I will not specifically include or exclude employees who are employed through a temporary employment agency. If there are any such employees employed during the eligibility period as defined supra in the Direction of Election, I will permit those employees to vote under challenge.

ENGINEERS

The Employer's suggested unit description includes the classification of "engineer." The Petitioner-Union does not specifically include or exclude that classification

in its unit description. An exhibit introduced by the Employer that lists all the employees during the calendar years 2000 and 2001 only lists one employee classified as an engineer: Thomas Truppi. There is a dearth of evidence about the engineer classification. The production foreman testified that the engineers work in the office, but also go into the field to quote jobs, obtain jobs, design jobs and to ensure the jobs are completed correctly. The production foreman stated that he considers Norkin and Ritter, who are vice-presidents with an ownership interest in the Employer, to be engineers. According to the Employer's President, Truppi is paid on a salary basis, but does not have any supervisory or managerial authorities. The Employer's President testified that Truppi, who was recently hired, works as an estimator. If the only work Truppi performs is that of an estimator, who obtains installation projects for the Employer, he would not have a community of interest with other unit employees. In light of the lack of clarity in the record about the job classification of engineer, I shall permit Truppi and any other employee classified as engineer to vote under challenge.

ELIGIBILITY FORMULA

The Petitioner-Union asserts that the formula set forth in *Daniel Construction Co.*, 133 NLRB 264 (1961), modified 167 NLRB 1078 (1967), reaff'd. in *Steiny & Co.*, 308 NLRB 1323 (1992) (hereinafter referred to as “the *Daniel* formula”) should be used for voting eligibility. The Board employs the *Daniel* formula when an employer is engaged in the construction industry and is currently performing construction work at various construction sites. *Brown & Root*, 314 NLRB 19 (1994). Under the *Daniel* formula, former employees who have a reasonable expectation of employment in the foreseeable future are permitted to vote even though they may not be presently employed by the employer. The Employer asserts that it is not engaged in the construction industry and, therefore, it would not be appropriate to use a *Daniel* formula.

At one time, the Employer performed work as a general contractor. Although this no longer is the case, the Employer maintains its general contractor's license. The Employer also maintains a warm-air heating, ventilating and air-conditioning license, a sheet metal license and a plumbing license. I do not find the fact that the Employer continues to renew its general contractors license to be determinative with respect to the issue of whether or not the Employer is engaged in the construction industry within the meaning of the *Daniel* and *Steiny* cases. According

to the Employer's President, at this time, no more than 25% of the Employer's work involves installation work, although 45% of the revenues are generated by installation work.

There is no evidence that the employees who work in the field on installation projects are laid off between projects. Rather, the record reveals that they return to the Employer's facility to work in the production department when they are not working on installation projects. For example, one employee testified that he works 50% of the time in the field on installation projects and 50% of the time in

the production shop. Not only do installation department employees return to the production department between installation projects, but there also is evidence that at least one employee assigned to the production department has performed installation work in the field when additional help was needed on a project.

In *Steiny*, supra at 1324, the Board reaffirmed the necessity of an eligibility formula in the construction industry because “construction employees may experience intermittent employment, be employed for short periods on different projects, and work for several different employers during the course of a year.” As the Board noted in *Oklahoma Installation*, 305 NLRB 812 at fn. 7 (1991), the rationale underlying the application of the *Daniel* formula in the construction industry is “to ensure that former employees of an employer who have a reasonable expectation of employment in the foreseeable future are permitted to vote even though they are not presently employed by the employer on a jobsite.”

In the instant case, the employees in the warehouse and the production departments are not engaged in construction work. Therefore, it would not be appropriate to apply the construction-industry voting eligibility formula to these employees. Furthermore, the employees who work in the installation department are not

laid off between jobs; rather, they return to the Employer’s facility to work in the production department. In these circumstances, the rationale underlying the *Daniel* formula is not applicable and it would not be appropriate to apply the *Daniel* eligibility formula.

MAIL BALLOT ISSUE

Since the Employer sometimes has installation projects outside the Southern California area, at any given time, installation employees may be working out of town. Therefore, a mail ballot election may be appropriate. The Petitioner-Union asserts that if a mail ballot election is used for the out-of-town employees, this procedure also should be used for the other employees who are working at the

Employer's facility. The Employer contends that if an election were ordered in the very near future, a mail ballot election may not be necessary. Since I am unable to determine from the record whether or not a mail ballot election would be appropriate, I will leave that decision to an administrative determination subsequent to the issuance of this Decision and Direction of Election.

There are approximately 28 employees in the unit.

- 3/ In accordance with Section 102.67 of the Board's Rules and Regulations, as amended all parties are specifically advised that the Regional Director for Region 21 will conduct the election when scheduled, even if a request for review is filed, unless the Board expressly directs otherwise.

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